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*Attorneys for ROE CL Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No.: 3:23-md-03084-CRB

Hon. Charles R. Breyer

This Document Relates to:

*Jane Roe CL 73 v. Uber Technologies,  
Inc., et al., No 3:24-cv-7030-CRB*

*Jane Roe CL 94 v. Uber Technologies, Inc., et  
al., No. 3:24-cv-09550-CRB*

*Jane Roe CL 99 v. Uber Technologies, Inc., et  
al., No. 3:25-cv-00855-CRB*

*Jane Roe CL 132 v. Uber Technologies, Inc.,  
et al., No. 3:25-cv-02744-CRB*

*Jane Roe CL 143 v. Uber Technologies, Inc.,  
et al., No. 3:25-cv-03260-CRB*

*Jane Roe CL 153 v. Uber Technologies, Inc.,  
et al., No. 3:25-cv-03818-CRB*

**ATTORNEY JENNIFER S. DOMER'S  
DECLARATION REGARDING  
PLAINTIFFS NOT IN COMPLIANCE  
WITH COURT'S SEPTEMBER 16, 2025  
ORDER**

Courtroom: 6 – 17<sup>th</sup> Floor

I, Jennifer S. Domer, declare as follows:

1. I am an attorney at Cutter Law P.C. admitted to practice before the courts of the State of California. I am a Partner at Cutter Law, P.C., and am one of the counsels of record for

1 all filed Jane Roe CL claimants. I have personal knowledge of the matters set forth herein, and if  
2 called to testify, I would testify competently as to the information below.

3 2. This declaration is made pursuant to the Court's Order to submit a Declaration  
4 within 28 days of the Order (October 13, 2025, being 28 days from September 16, 2025, the date  
5 the Order was signed) as to whether Counsel disagrees with any Plaintiff inclusion in Uber's  
6 Declaration, which Defendants submitted on October 6, 2025.

7 3. Counsel's firm has made extensive efforts to reach clients listed as Exhibit A,  
8 subject to Defendants' Motion to Dismiss.

9 4. Counsel submitted a response to the Opposition Motion on September 5, 2025,  
10 and explained we would continue to make efforts to reach any missing claimants.

11 5. Those efforts include extensive phone calls, text messages, emails, physical  
12 mailings to last known address, and additional address searches in databases. Counsel has also  
13 employed a private investigator to help locate these individuals. Through the database searches  
14 and private investigators, Counsel also attempted to reach potential relatives in an effort to reach  
15 the Plaintiffs.

16 6. Through those continued efforts, Counsel received two deficiency cures after the  
17 date that Defendants submitted their Declaration.

18 7. Counsel submitted the Exhibit C Release for the PFS for Jane Roe CL 132 on  
19 October 9, 2025.

20 8. Counsel submitted the Verification for the PFS for Jane Roe CL 99 on October  
21 13, 2025.

22 9. Though late, the submission of their deficiencies is still prior to the Court entering  
23 an Order for Dismissal.

24 10. Lastly, Jane Roe CL 94 was listed for not producing the Exhibit A Release.  
25 However, the PFS does not indicate a physical injury in Question 36 that would necessitate a  
26 Release for Exhibit A. Counsel emailed Defense Counsel October 13, 2025, and is awaiting a  
27 response.

28 11. Counsel would therefore dispute their inclusion on Uber's current list of deficient

1 PFSs for their Motion, as well as ask for their exclusion on the Court's future entry of Dismissal.

2 I declare under penalty of perjury that the foregoing is true and correct, and that this  
3 declaration was executed on October 13, 2025, in Sacramento, California.

4  
5 Dated: October 13, 2025

CUTTER LAW P.C.

6  
7 By: /s/ Jennifer S. Domer

8 Jennifer S. Domer  
9 *Attorney for Jane Roe CL Plaintiffs*